

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

GOVERNMENT EMPLOYEES HEALTH
ASSOCIATION, on behalf of itself and all
others similarly situated,

Plaintiff,

v.

ACTELION PHARMACEUTICALS LTD.,
et al.,

Defendants.

Case No. 18-cv-3560-GLR

**MOTION FOR LEAVE TO FILE MATERIALS PROVISIONALLY UNDER SEAL
PURSUANT TO LOCAL RULES 104.13 AND 105.11 AND THE STIPULATED
PROTECTIVE ORDER**

Non-party Mayor and City Council of Baltimore respectfully moves for leave to file the Non-Party Memorandum of Law in Opposition to Defendants' Motion to Compel Documents in Response to Rule 45 Subpoena and corresponding attachments under seal. Pursuant to Section 2.D.ii of the Court-ordered Stipulated Protective Order (ECF No. 80), "[d]ocuments containing or describing Confidential Material may be provisionally filed under seal, with redacted versions filed publicly within 14 days thereafter." The brief, declaration, and exhibits quote and describe information which Defendants and non-parties have designated as Confidential Material pursuant to the Stipulated Protective Order. The Stipulated Protective Order further provides that the motion to seal must be accompanied by a proposed "order pursuant to Local Rule 105.11 of this Court." Accordingly, non-party Mayor and City Council of Baltimore respectfully requests that the Court enter the attached proposed Order granting leave to file the documents under seal on a provisional basis and to thereafter file public versions that redact or seal only the Confidential Materials.

Dated: October 17, 2022

Respectfully submitted,

/s/ Sharon K. Robertson

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CERTIFICATE OF SERVICE

I, Sharon K. Robertson, hereby certify that I caused a copy of the foregoing to be filed electronically via the Court's CM/ECF system. Those attorneys who are registered CM/ECF users may access the foregoing, and notice will be sent to those parties by operation of the CM/ECF system. The foregoing, and the brief, declaration and exhibits which have been filed provisionally under seal on the Court's ECF system will be served on all parties via e-mail.

Dated: October 17, 2022

/s/ Sharon K. Robertson
Sharon K. Robertson